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October 30, 2018

VIA ECF

The Honorable Steven L. Tiscione  
United States District Court  
Eastern District Of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Guangzhou Love Live Culture Development Limited Company v. Belinda International Limited, et al.; Civil Action No. 1:16-cv-862 (CBA - ST)

Dear Magistrate Judge Tiscione:

I represent the defendants Belinda International Limited, d/b/a Belinda International Entertainment Group ("Belinda") and Kam Yan Leung, a/k/a Angela Wong ("Leung") and third-party witness Kim Wa Wong ("Wong"), who is the husband of Leung, in the above - referenced action. By this letter, I move to be relieved as attorney for defendants Belinda and Leung and third-party witness Wong. By Order of the Court, this motion was required to be made by no later than October 31, 2018.

I have been advised by and on behalf of Leung, Belinda and Wong that, over the past weeks, they are and have been in the process of substituting new but unnamed counsel for me as attorney. Today, I was advised that they have located and identified substitute counsel and expect to retain him/her imminently. The name of said counsel was not disclosed to me. I was further advised today by and on behalf of Leung, Belinda and Wong that they have no objection to having me relieved as their attorney.

Concomitant with this has come a distinct lack of communication and cooperation. Depositions of defendants Belinda and Leung and third-party witness Wong had been scheduled and then rescheduled, respectively, for October 12, 17 and 19, 2018. I had scheduled a conference at my office with Belinda and Leung for October 9, 2018. Shortly before the latter date, I was advised by Leung, on behalf of herself and Belinda that they would not appear at my office and on behalf of Leung, Belinda and Wong, that they would not appear for the depositions. I was further advised that they were interviewing several potential substitute counsel and would retain one shortly. While it was made clear that they were discussing the merits of this action with those counsel, it was also made clear to me that there was no longer any need to communicate with me with respect to the merits of the above-referenced action. At that time, I was also advised by Leung, Belinda and Wong that I must obtain an adjournment of the depositions to give them time to interview and retain substitute counsel. Thereafter, the attorney for Plaintiff extended the

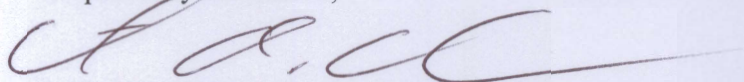
courtesy of adjourning the discovery deadline so that new dates for the depositions could be set on condition that I move to be relieved by a deadline to be set by the Court. The Court ordered that I move to be relieved as counsel by no later than October 31, 2018. As noted, as of the present date, I am advised that substitute counsel has been identified but not yet retained and, Leung, Belinda and Wong agree that I should be relieved as their attorney.

In any event, given the lack of communication and cooperation, I have been effectively discharged as counsel, which is the prerogative of defendants and Wong. I cannot be expected to represent the defendants and Wong without any substantive communication or cooperation, which is the case here. Accordingly, this motion is necessary at this time by Order of the Court and the relief sought on the motion is necessary legally and as a practical matter.

Finally, issues exist between defendants and me with respect to payment for work, labor and services in a substantial amount going back over a year. Even if defendants and Wong were cooperating and communicating sufficiently about the merits of the case, I cannot be expected to and I am not in a position to finance this action.

It is respectfully requested that the within motion, which is not opposed by defendants, the third-party witness or the Plaintiff, be granted.

Respectfully submitted,



Robert A. Roseman

cc: By E-Filing

Kerry J. Kaltenbach, Esq.  
Zhong Lun New York LLP  
Attorneys for Plaintiff

By E-Mail

Defendants Belinda International Limited, d/b/a Belinda International Entertainment Group  
And Kam Yan Leung, a/k/a Angela Wong and  
Third-Party Witness Kim Wa Wong